

1 Muriel B. Kaplan, Esq. (SBN 124607)  
Michele R. Stafford, Esq. (SBN 172509)  
2 SALTZMAN & JOHNSON LAW CORPORATION  
44 Montgomery Street, Suite 2110  
3 San Francisco, CA 94104  
(415) 882-7900  
4 (415) 882-9287 – Facsimile  
[mkaplan@sjlawcorp.com](mailto:mkaplan@sjlawcorp.com)  
5 [mstafford@sjlawcorp.com](mailto:mstafford@sjlawcorp.com)

6 Attorneys for Plaintiffs

7  
8 UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 BAY AREA PAINTERS AND TAPERS  
PENSION TRUST FUND, et al.

11 Plaintiffs,

12 v.

13 J.F. McCRAY PLASTERING, INC., a  
14 California Corporation,

15 Defendant.

Case No.: C14-0604 SI

**PLAINTIFFS' REQUEST TO CONTINUE  
CASE MANAGEMENT CONFERENCE;  
[PROPOSED] ORDER THEREON**

Date: May 23, 2014

Time: 2:30 p.m,

Dept.: Courtroom 10, 19th Floor, San  
Francisco, CA

Judge: Honorable Susan Illston

16  
17 Plaintiffs herein respectfully request that the Case Management Conference, currently on  
18 calendar for May 23, 2014 be continued for approximately ninety (90) days. Good cause exists for  
19 the continuance, as follows:

20 1. As the Court's records will reflect, this action was filed on February 7, 2014 to  
21 collect unpaid contributions and related amounts owed to Plaintiffs for work performed by  
22 Defendant's employees.

23 2. Defendant was served with the Complaint on March 12, 2014, and a Proof of  
24 Service of Summons was filed with the Court on March 31, 2014. Defendant failed to plead or  
25 otherwise respond to the lawsuit, and the Clerk entered Defendant's default on April 7, 2014.

26 3. Plaintiffs will make a final attempt to resolve this matter informally with  
27 Defendant. If the parties are unable to come to an agreement, Plaintiffs anticipate filing a Motion  
28 for Default Judgment.

I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above entitled action, and that the foregoing is true of my own knowledge.

**SALTZMAN & JOHNSON  
LAW CORPORATION**

Muriel B. Kaplan  
Attorney for Plaintiffs

Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case Management Conference is hereby continued to Aug. 22, 2014, at 2:30 pm. All related deadlines are extended accordingly

Susan Blanton

UNITED STATES DISTRICT JUDGE

**PROOF OF SERVICE**

I, the undersigned, declare:

1. I am a citizen of the United States and am employed in the County of San Francisco, State of California. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

2. I am over the age of eighteen and not a party to this action.

3. On **May 13, 2014**, I served the following document(s):

**PLAINTIFFS' REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE;  
[PROPOSED] ORDER THEREON**

on the interested parties in said action by enclosing a true and exact copy of each document in a sealed envelope and placing the envelope for collection and First Class mailing following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

4. The envelopes were addressed and mailed as follows:

**J.F. McCray Plastering, Inc.  
2590 South River Road  
West Sacramento, CA 25691**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **May 13, 2014**, at San Francisco, California.

\_\_\_\_\_/S/  
Alicia Rutkowski  
Paralegal